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**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

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UNITED STATES OF AMERICA

V.

CHRISTINA PATACKY-BEGHIN

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:

CR. NO. 3:23-CR-00026

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**MOTION FOR ENLARGEMENT OF TIME TO FILE PRETRIAL MOTIONS  
AND CONTINUANCE OF TRIAL**

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AND NOW, comes Defendant, Christina Patacky-Beghin, by and through his counsel, David S. Glanzberg, Esquire, who files this Motion for Continuance of Pretrial Motions and Trial, averring as follows:

1. The Defendant was charged by indictment, filed on or about February 14, 2023 with one count of conspiracy to distribute a controlled substance (21 U.S.C. section 841 (a)(1), 841 (b)(1)(A) & (C) and section 846).
2. Pretrial motions are currently due on October 31, 2023.
3. Discovery on this case is extremely voluminous.
4. The Assistant United States Attorney assigned, Michelle Olshefski, Esq., does not oppose Defendant's request for more time.
5. For the above stated reasons, the Defendant requests a sixty (60) day extension of time to prepare for trial.
6. Respectfully, failure to grant this request for an extension would likely result in a miscarriage of justice and deny counsel for the Defendant the

reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(A) and (iv).

WHEREFORE, the Defendant, Christina Patacky-Beghin, respectfully requests that this Honorable Court grant this motion to extend the time to file pretrial motions for sixty (60) days and the trial to be continued, accordingly.

October 30, 2023

Respectfully Submitted:

/s/ David Glanzberg, Esquire  
David S. Glanzberg, Esquire  
Attorney for Defendant  
Glanzberg Tobia Law, P.C.  
123 S. Broad St, Suite 1640  
Philadelphia PA 19109  
(215) 981-5400

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of Defendant's Motion to Continue and the Government's concurrence therewith, the Court finds that the ends of justice will be served by affording such an extension. The Court further finds that an extension outweighs the best interests of the public and the Defendant in a speedy trial, and that any delay occasioned by this continuance shall be excluded from speedy trial calculations pursuant to U.S.C. §3161(h)(7).

Accordingly, it is hereby Ordered that Defendant's Motion is GRANTED. Defendant shall file pretrial motions no later than \_\_\_\_\_, 20\_\_\_\_. Jury Selection and Trial will be scheduled after the expiration of the motion deadline, or, if one or more pretrial motions are filed, or a motion seeking a further extension of time to file pretrial motions is granted, after the resolution of any such pretrial motion that may be filed.

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**United States District Judge**

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**CERTIFICATE OF CONCURRENCE**

I, David S. Glanzberg, CJA appointed counsel, certify that I communicated with Michelle Olshefski, Assistant United States Attorney, and counsel advised that she concurs in the within motion.

Date: October 30, 2023

/s/ David Glanzberg

**David S. Glanzberg, Esq.  
CJA Appointed Counsel**

**CERTIFICATE OF SERVICE**

I, David S. Glanzberg, Attorney for the Defendant do hereby certify that this document, the foregoing Motion to Continue Pretrial Motions and Trial, filed electronically through the ECF system, will be sent to the registered participants as identified on the Notice of Electronic filing, including the following:

Michelle Olshefski, Esq.  
Assistant United States Attorney

October 30, 2023

*/s/ David Glanzberg, Esquire*

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David S. Glanzberg, Esquire  
Attorney for Defendant